

# EXHIBIT G

## FEDERAL BUREAU OF INVESTIGATION

Date of entry 01/03/2023

David Goran (GORAN), DOB 5/19/1966, home address 13509 Williamson Road, Rancho Cucamonga, CA 91739, cellular telephone number 951-907-0225, appeared for a proffer session at the United States Attorney's Office, Southern District of New York, 50 Main Street, White Plains, NY. Accompanying GORAN was his counsel, Sam Braverman. Present were SA Lawrence Lonergan, SA Louis Hillyard, SA Haley Hoffman (USSS), and AUSA Ben Klein. Present telephonically were FBI SA Alejandra Sanchez and DEA Task Force Officer Steven Gonzalez. After being advised of the identities of all present, GORAN provided the following information:

GORAN was introduced to Joel Zubaid (ZUBAID) by Shavand Aryana (ARYANA) approximately 6 years ago. GORAN loaned ZUBAID approximately \$350,000 for the purchase of a hotel in Kingman, AZ. The property went into foreclosure and GORAN lost his investment. GORAN did not associate with ZUBAID for approximately 2 years after their initial business dealings. GORAN was then reintroduced to ZUBAID. GORAN stated he made back 90-100% of his first investment loss with ZUBAID on the foreclosure of a separate property they held.

**SOLDIERS OF AMERICA**

ZUBAID had a non-profit named Soldiers Of America (SOA) with a man named Glenn Coplin (COPLIN). SOA was a non functioning non-profit. In late 2020 or early 2021, California foreclosure law changed as a result of the COVID pandemic. The change allowed certain types of bidders, to include non-profits, the ability to electronically submit notices of intent on foreclosed properties. Following the notice of intent, the bidder had 45 days to finalize a sale. ZUBAID pitched this as an opportunity to GORAN whereby they could submit multiple notices of intent on properties and then conduct market research during the 45 day period to determine whether or not a sale was profitable and should be finalized. GORAN and ZUBAID reformed SOA in order to conduct the aforementioned purchases. COPLIN had been banned from SOA as a result of anger outbursts. GORAN stated the money used to purchase properties came from legitimate investors such as Laura Kaley, an investor and restaurateur, and Bob and Bryan LNU, a father-son investment

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duo. GORAN admitted to creating fictitious bank statements which inflated account balances in order to show real estate sellers sufficient funds existed in the account for a sale. If a transaction proceeded, GORAN and ZUBAID would attempt to obtain a loan in order to complete a sale.

**CREDIT CARDS**

GORAN stated ZUBAID met Sergio Knight (KNIGHT) during COVID when ZUBAID and KNIGHT tried to sell Personal Protective Equipment (PPE) together. KNIGHT was in his late 60's and had a "mafioso" image. It was through KNIGHT that ZUBAID met Gazi Khan (KHAN). Initially KHAN and his cohabitant "wife," Victoria Choi (CHOI), offered to invest \$10 million in real estate deals with ZUBAID and GORAN. However, after reneging on several deals, only one, smaller, real estate transaction occurred.

GORAN stated it was KHAN who had the idea for credit cards. KHAN had "credit partners," people who were witting and were ok with their credit cards being charged. KHAN claimed to have the ability to "load" huge amounts onto credit cards. GORAN likened this to overpaying credit card statements. KHAN could provide the credit card information but needed legitimate businesses with merchant accounts to charge the credit cards. ZUBAID identified Martin Mizrahi (MIZRAHI) and Julian Rebiga (REBIGA) as business owners that fit the bill. ZUBAID, MIZRAHI, REBIGA, and KHAN would all get a "cut" of the transactions. ZUBAID made statements to GORAN the intent was to default on the credit card payments and keep the "cuts." GORAN stated ZUBAID directed GORAN to create fictitious invoices pertaining to the charges which GORAN would do, creating invoices on REBIGA's company letterhead, either CNN logistics or Sunsetcast Media System. GORAN would also sign the invoices with the name of the credit card holder. When asked, if the credit card holders were witting, why couldn't they sign the invoices, GORAN stated he believed it was because he could do so faster. GORAN believed \$800,000 in cash resulting from the credit card charges went to MIZRAHI and that MIZRAHI paid out \$800,000 to KHAN through either cash or wire. ZUBAID had told GORAN MIZRAHI was holding his money thinking the charges would be charged back.

**OB MARKETING & RESEARCH INC WIRES**

GORAN held Bank Of America (BOA) account 3251 3732 8657 in the name of OB Marketing & Research Inc. ZUBAID was added as a signatory on the account and had access to the account. With regards to deposits made by Brownsville Community Development, GORAN stated he was trying to understand the balances in the account following the deposits. ZUBAID informed GORAN a wire had come in for approximately \$400,000. ZUBAID directed GORAN to immediately

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wire the money out of the account despite GORAN warning he should wait. ZUBAID claimed the money had to do with real estate. ZUBAID directed GORAN where to wire the money, either to MIZRAHI or Bahram Madaen (MADAEN) so that the money could be converted to Bitcoin. GORAN was unaware of what ZUBAID's "cut" of the wires were. When the BOA funds were frozen, ZUBAID pressured GORAN to call BOA in order to unfreeze the funds. GORAN subsequently called the bank in order to unfreeze the funds and "ad-libbed" with the representative. GORAN admitted his comments to the representative, that there was product on the docks, was not true.

**BULK CASH**

GORAN stated KNIGHT set up the deals which involved ZUBAID and GORAN converting money to Bitcoin. GORAN stated Andrea Zubaid (A. ZUBAID), ZUBAID's wife, had been setting up "cash accounts," bank accounts capable of taking in cash. GORAN had been told KNIGHT had shop owners who wanted Bitcoin. Money would be pooled and sent to MIZRAHI or MADAEN who would purchase Bitcoin and then send the Bitcoin to KNIGHT's contacts. GORAN stated it was apparent the money was not from shop owners as the amount of cash being handled was too much. The money was cartel money. For example, each amount was between \$80-\$200 thousand dollars. Money would either be delivered to the OB Marketing & Research Inc office, delivered to other locations like San Dimas, CA, or picked up from Claudia Guadalupe Renee Vidaurri Gurmilan (CLAUDIA), also known as "Negra," at her Southgate office.

GORAN did not recall the names on the ATM cards used to deposit money. They may have been in the name of ZUBAID, A. ZUBAID, and GORAN. ZUBAID would tell GORAN where to deposit money. For example, a percentage of money in one account and a percentage of money into another account.

GORAN described the flow of money as follows: Cash would be deposited into bank accounts then wired to MIZRAHI or MADEAN for conversation to Bitcoin. Cash would also be provided directly to MIZRAHI and perhaps MADAEN for conversion into Bitcoin. Cash may have also been provided to KHAN. Julian Rebiga (REBIGA) may have received cash which was then sent by REBIGA to MADAEN or MIZRAHI for conversion to Bitcoin.

ZUBAID directed GORAN to Zelle money to certain individuals, to include Sinval Oliviera (OLIVIERA).

The conversion of cash to Bitcoin began approximately one and a half years ago and lasted 3-6 months or 6-12 months. GORAN stated it was hard to tell how long it lasted. ZUBAID and GORAN had stopped converting cash to Bitcoin. GORAN stated he knew ZUBAID was paying off a debt to the cartel,

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described in detail below, for the duration of the cash to Bitcoin scheme.

#### **OB MARKETING & RESEARCH OFFICE**

When money was delivered to the OB Marketing office, the individual delivering the cash would arrive at the office with a bag full of cash and enter the office with ZUBAID and GORAN. Inside the office were two high speed currency counters. The money would be counted verifying the amount. GORAN, ZUBAID, and A. ZUBAID would then deposit the money into a "cash account." GORAN identified Raul Contreras (CONTRERAS) as an individual that delivered money to the OB Marketing office. On at least one occasion, CONTRERAS was accompanied by Joel Reyes (REYES). GORAN identified REYES by a picture provided to GORAN. There was no safe within the OB Marketing office. Money was rarely kept overnight.

#### **CLAUDIA's OFFICE**

GORAN described picking up cash from CLAUDIA based on the 3-4 times he accompanied ZUBAID to CALUDIA's office. ZUBAID and GORAN entered through a gated driveway and went through a back alley. ZUBAID entered the office and returned with cash while GORAN waited in the car. GORAN believed ZUBAID made 1.5-2.5% percent of the cash amount for depositing cash and converting it to Bitcoin. GORAN believed he made \$2-3 thousand dollars for aiding ZUBAID in depositing cash and converting it to Bitcoin. GORAN stated the cash was received 2-3 times a week then there were days when nothing was received. This lasted for 3-4 months.

GORAN was shown a copy of a Notice To Appear ticket from the South Gate Police Department issued to Diego Acosta OVALLE for "Poss \$ From Sale." An image of the ticket had been sent from ZUBAID to GORAN through Whatsapp. GORAN believed the the picture originated from CLAUDIA and was shared in order to advise ZUBAID and GORAN to look out for police or to warn of potential robbery when transporting bulk cash. GORAN admitted to accompanying ZUBAID when transporting bulk cash in order to look out for police. GORAN also accompanied ZUBAID to Las Vegas when transporting bulk cash in order to keep ZUBAID company.

GORAN stated CLAUDIA had several people with which she was laundering money.

Angelica LNU (ANGELICA) was either above CLAUDIA or on the same level as REYES. ANGELICA would call ZUBAID about money and accounted for money. GORAN believes ANGELICA resides in Mexico. GORAN stated perhaps ANGELICA was above REYES and below the "head guy."

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Jeronimo LNU (JERONIMO) was similar in position to ANGELICA.

**CARTEL DEBT**

According to ZUBAID, he (ZUBAID) owed a debt to the cartel. ZUBAID explained the debt to GORAN as follows: ZUBAID, KNIGHT, and Eduardo LNU (EDUARDO) were part of an original large cash deposit to Bank Of America on behalf of the cartel. The money was to be converted to Bitcoin. ZUBAID watched as KNIGHT and EDUARDO walked into a bank and made the deposit. The money, approximately \$400,000, was wired out but never converted to Bitcoin. GORAN believed Andrew DeMaio (DEMAIO) was the person who received the wire and failed to provide Bitcoin in response. Since DEMAIO was ZUBAID's Bitcoin guy, ZUBAID was responsible for the debt to the cartel. ZUBAID had been threatened regarding paying off the debt. ZUBAID still owes approximately \$60-90 thousand dollars as part of his debt to the cartel.

ZUBAID owed a separate debt to MIZRAHI. ZUBAID told MIZRAHI, DEMAIO, who also resides in Las Vegas, owed ZUBAID a debt and MIZRAHI could collect DEMAIO's debt to ZUBAID in order to pay off ZUBAID's debt to MIZRAHI. Any money collected from DEMAIO in excess of ZUBAID's debt to MIZRAHI could be given to ZUBAID. GORAN described MIZRAHI as a "thug." GORAN heard MIZRAHI say he had found DEMAIO in a gated community, kidnapped DEMAIO, and held DEMAIO for more than a day to get the money, ultimately sweating it out of DEMAIO. After which ZUBAID was square with MIZRAHI. MIZRAHI never provided ZUBAID with the money collected in excess to ZUBAID's debt to MIZRAHI.

**REBIGA INSURANCE FRAUD**

REBIGA's company CNN Logistics was an insurance client of GORAN and GORAN's partner Rene LNU. REBIGA claimed a shipping container was stolen from REBIGA's warehouse and submitted an insurance claim. Rene did not think the claim was covered and suspected insurance fraud was being attempted by REBIGA. This had occurred within the last 3 months.

**ZUBAID'S MEETING**

Following ZUBAID and GORAN's arrest, ZUBAID called a meeting at a Dennys restaurant. Present during the meeting were ZUBAID, Rene LNU, Rico Garcia, Ray Smiley, and Chad Cunningham. ZUBAID called the meeting in order to discuss getting GORAN out of jail. During the meeting ZUBAID claimed to have a new cellular telephone. ZUBAID expressed interest in finding people who should also be named as being part of the activities ZUBAID and GORAN were arrested for. ZUBAID also claimed to have enough money for financial forfeiture purposes.